

SUMMARY ASSESSMENT SIGN-OFF SHEET

For COCA Site: CFA-30 (Tank 744)

Approved by:

Lauren C. Hull
L. C. Hull, Manager
COCA Management and Implementation

5/9/91
Date

Reviewed by:

W. R. Pigott
W. R. Pigott, Manager, WAG-4

May 9, 1991
Date

J. P. Shea
J. P. Shea, ERP Independent Review
Chairman

May 7, 1991
Date

CFA-30
SUMMARY ASSESSMENT
April 15, 1991

1. UNIT NAME

CFA-30 Waste Oil Tank (#744) at Building Central Facilities Area (CFA)-665.

2. INTRODUCTION

CFA-30 was a bulk storage tank used to collect used and waste oil products from the vehicle maintenance facility (Big Shop) CFA-665. CFA-30 was labeled as a Consent Order and Compliance Agreement (COCA)¹ site because of the possibility of hazardous waste or material stored in the tank contaminating groundwater.

Information contained in this summary assessment was obtained from current inventory records, historical tank use records, and sampling and laboratory analytical results. The information presented summarizes CFA-30 activities to date.

3. PHYSICAL DESCRIPTION

CFA-30 was a 1000-gallon capacity underground storage tank constructed of tar-coated carbon steel, and it was located near the north side of Building CFA-665. Figure 1 shows a diagram of the location of CFA-30, and Figure 2 is a photograph of the tank's location before it was removed.

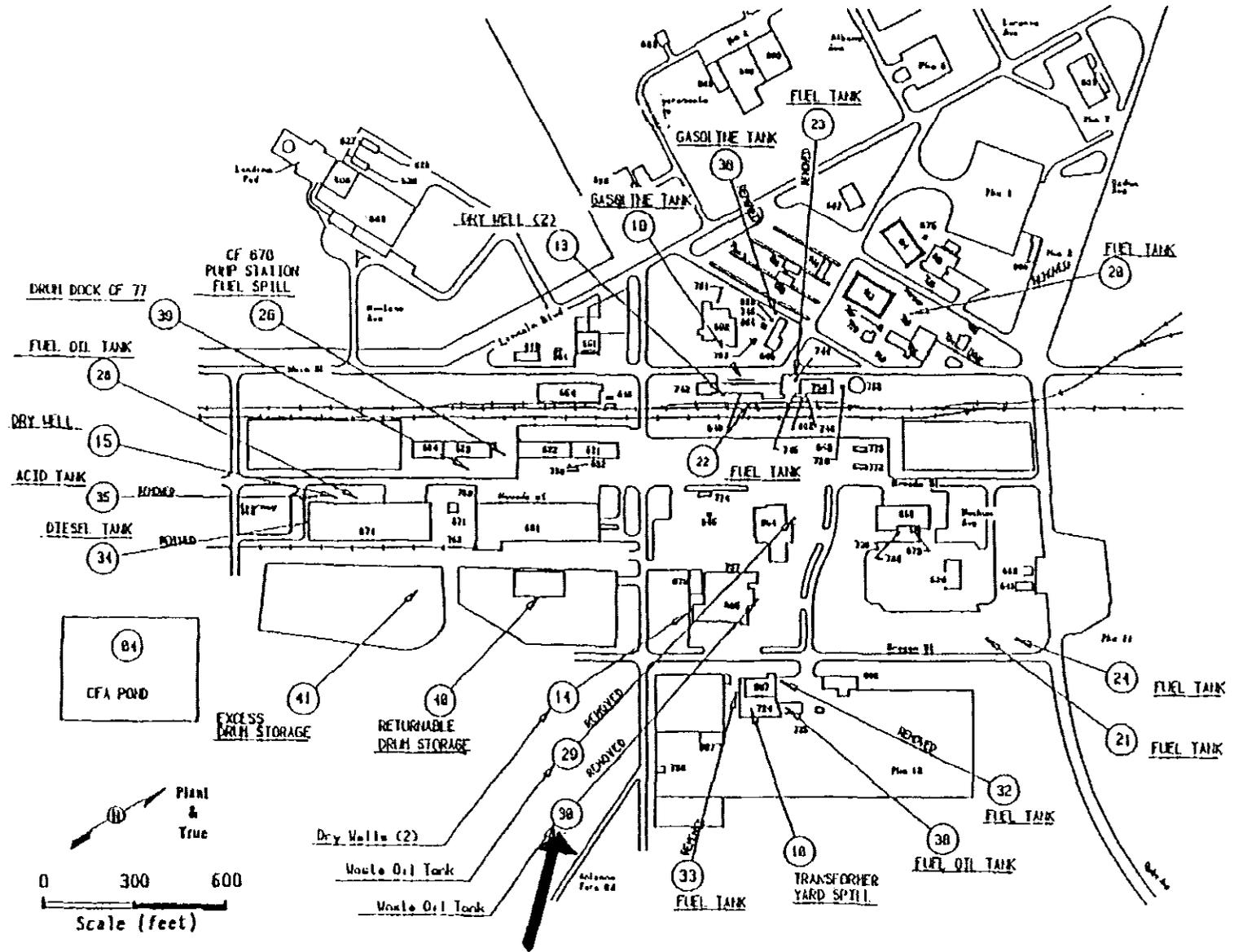


Figure 1. Map of the south portion of CFA showing COCA Unit 30 (Tank 744), other COCA units, and CFA buildings.

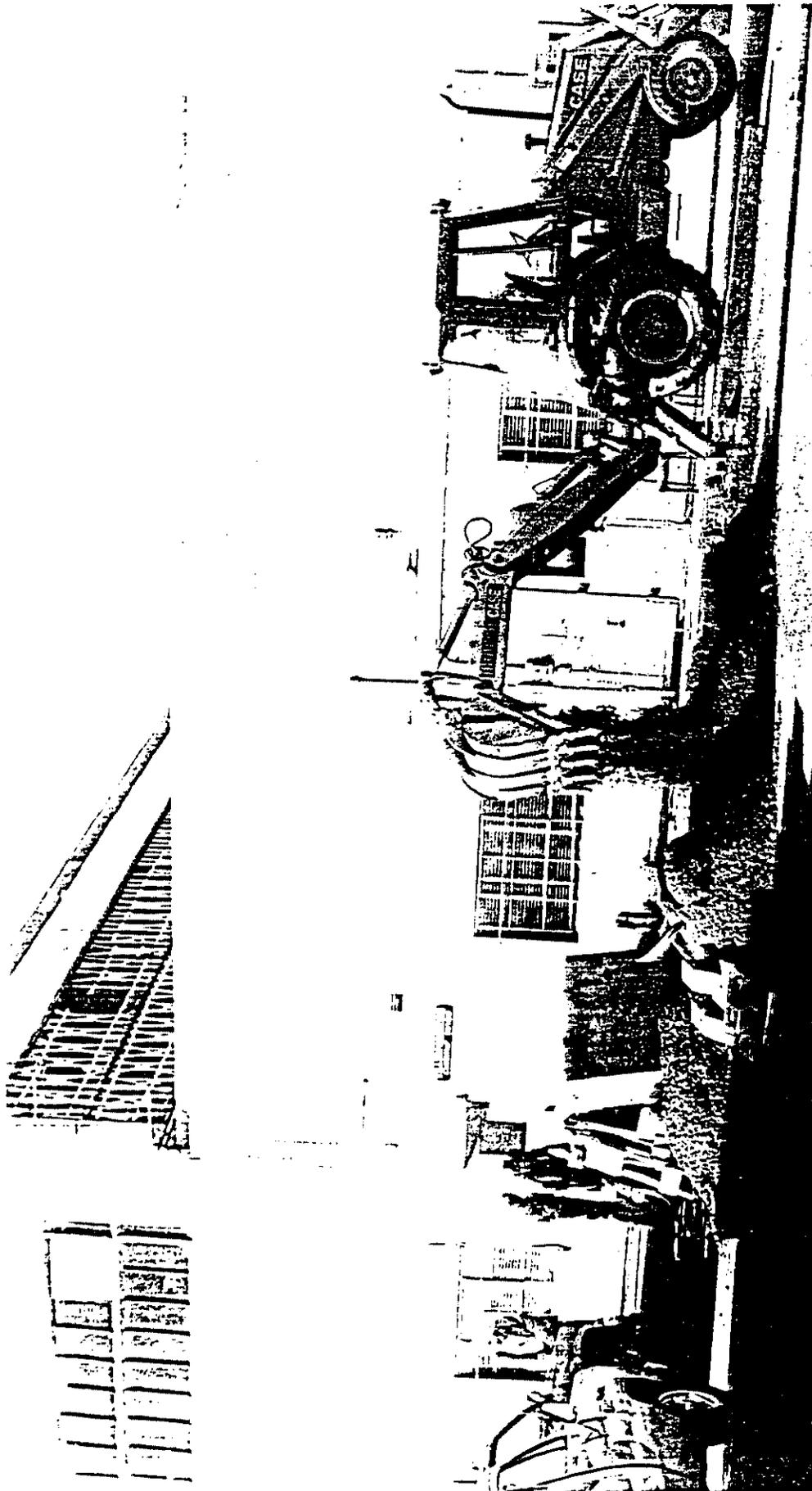


Figure 2. Location of COCA Unit CFA-30

4. PURPOSE AND HISTORY OF UNIT

The tank at CFA-30 was installed in 1960 and was used as a bulk storage tank for collecting used and waste oil products from the crankcases of buses and other equipment at the vehicle maintenance facility CFA-665. An initial survey of CFA-30 was conducted in October 1986.

On August 26, 1989, a Petro-Tite Tank System Tightness Test was performed on CFA-30. CFA-30 failed the tank tightness test (with a net volume loss of -20.000 gallons per hour) and subsequently was scheduled for removal. The source of the leak was a rubber stopper on top of the tank. The product was pumped from tank following the test.

5. RESULTS OF INITIAL ASSESSMENT

CFA-30 received a score of 3.2 using the Environmental Protection Agency Priority Ranking System. This score was based on the assumption that the tank contained waste oil.

6. RESULTS OF SUMMARY ASSESSMENT

CFA-30 should be removed from the universe of Solid Waste Management Units because the tank was removed and the site was determined to be free of hazardous constituents.

7. METHODS OF SUMMARY ASSESSMENT

7.1 INEL Site Development Plan

Figure 12 in the INEL Site Development Plan² shows CFA-30 as a 1000-gallon capacity waste oil storage tank.

7.2 Tank Removal Procedure

The tank was exhumed and the tank bed was sampled on September 29, 1989. Figures 3 and 4 show CFA-30 tank postremoval and the tank excavation site, respectively. For safety and sampling purposes, volatile organic compound levels in the tank excavation and excavated soils were monitored by the EG&G Idaho Environmental Technology Unit staff using a Photovac Microtip Photoionization Detector (PID) (following procedures outlined in EG&G, 1990³).

Excavation soil samples collected underneath the tank at CFA-30 were sent to Data Chem Laboratories in Salt Lake City, Utah, for analysis of benzene, toluene, ethylbenzene, and xylene (BTEX) using EPA Method SW-846-8020.⁴ The samples were also analyzed by Data Chem Laboratories for total petroleum hydrocarbons (TPH) using the California Department of Health Services Method.⁵ However, all data used to support this summary assessment are unvalidated.

7.3 Laboratory Analysis of Soil Samples, Data Chem Laboratories

Contaminant concentrations in the soil were compared to action levels per an agreement with EPA Region 10 and the Idaho Department of Health and Welfare, Division of Environmental Quality. Action limits defined in this agreement follow the State of California Department of Health Services LUFT Field Manual.⁶ The maximum allowable action levels for BTEX and TPH in diesel waste oil are .3, .3, 1, 1, and 1000 ppm, respectively.

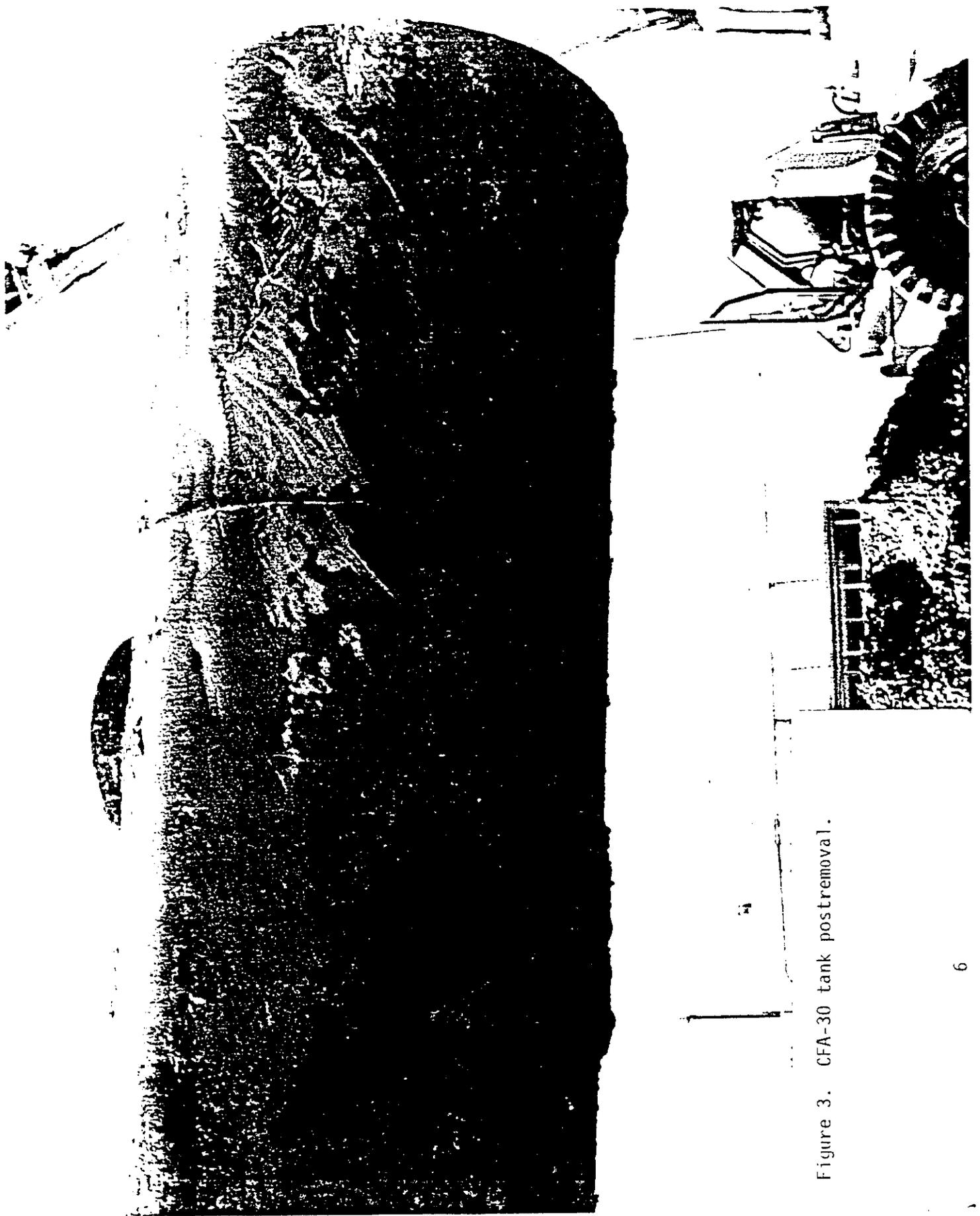


Figure 3. CFA-30 tank postremoval.



Figure 4. CFA-30 excavation site.

Independently, the INEL Tank Management Program has imposed more conservative action limits of .25, .25, .8, .8, and 800 ppm for BTEX and TPH, respectively. Analytical results for BTEX testing of CFA-30 soil samples ranged from ND (parameter not detected) to .10 ppm. Soil samples for TPH testing ranged from 3.0 to 76.0 ppm, levels below the most conservative action limits. These test results confirm a noncontaminated status.

7.4 Tank Completion Activities

CFA-30 was removed on September 29, 1989. Following excavation, the pit was backfilled with the clean soil that had been removed and with clean soil from the gravel pit at the Idaho National Engineering Laboratory CFA. Tank 744 was moved to the tank storage yard at CFA, cut up, and excessed to the State of Idaho, Lost River Highway Department, to be used for road culverts.

8. SITE OBSERVATIONS

During a site visit on February 26, 1991, it was noted that CFA-30 was level, it contained an adequate amount of backfill dirt, the area that had surrounded the tank appeared clean, and the COCA CFA-30 sign was posted accordingly.

9. CONCLUSIONS

Based on the historical records of CFA-30, laboratory analyses of the soil samples from the area surrounding the exhumed tank, and appearance of the restored site, CFA-30 should be removed from the universe of Solid Waste Management Units. The site has been determined to be clean, and the tank has been removed and disposed of properly.

10. REFERENCES

1. Consent Order and Compliance Agreement 1085-10-07-3008: In the matter of: United States Environmental Protection Agency and the United States Department of Energy, Idaho National Engineering Laboratory ID4890008952. Proceedings under Section 3008(h) of the Resource Conservation and Recovery Act (RCRA) 42 U.S.C. Section 692 8(h).
2. EG&G Idaho (EG&G Idaho, Inc.), 1985, Site Development Plan, May.
3. EG&G Idaho (EG&G Idaho, Inc.), 1990, Sample Analysis Plan for Site Assessment During the Closure or Replacement of Nonradioactive Underground Storage Tanks, EGG-ESQ-9116, August.
4. EPA (U.S. Environmental Protection Agency), 1986, Test Methods for Evaluating Solid Waste, Physical Chemical Methods, 3rd edition, SW-846.
5. California State Water Resources Control Board, 1988, Leaking Underground Fuel Tank (LUFT) Manual, May.
6. State of California Leaking Underground Fuel Tank Task Force, 1988, Leaking Underground Fuel Tank Field Manual: Guidelines for Site Assessment, Cleanup, and Underground Storage Tank Closure, May.

IDAHO UNDERGROUND STORAGE TANK
Permanent Closure Form

Site Owner/Operator: U. S. Department of Energy, Id Ops. Office
 Site Address: 785 DOE Place
 Site County: Bonneville
 Telephone: (208) 526-0193 Facility ID (Notification Number): _____

Tank was previously Registered Never Registered
 Fire District: INEL, Scoville, Idaho
 Local Closure Permit obtained from: Not Applicable

Tank Closure Performed By:
 Company: EG&G Idaho, Inc. Telephone: 526-9876
 Date of Closure: _____ Method of Closure: Removal In-Place Closure
 If closed in-place, type of fill material used: _____

How will old tanks be disposed of? Scrap Landfill
 Other(specify) Recycled
 Disposal Location: _____

TANKS CLOSED

Tank ID#	Age	Size	Last Substance Stored
CFA 741-6	29	10,000	Diesel
CFA 743	38	2,000	Waste Oil
CFA 744	29	1,000	Waste Oil
PBF 741	25	500	Diesel
TAN/IET 1711	32	50,000	Diesel
TAN/IET 1712	32	30,000	Heating Oil
TAN/IET 1713	32	20,000	Diesel

Will tanks be replaced by new underground tanks? Yes No
 (NOTE: If yes, you need to submit a notification form for the new tanks.)

Site assessment was completed and: No contamination was found
 Contamination was found
 (NOTE: Regional office of the Idaho Bureau of Water Quality should be contacted for assistance if contamination is found. Records of closure must also be maintained at the site and available upon inspector's request for three years after closure).

Inspecting Agency: Not Applicable Inspector's Name: _____
 (NOTE: This is generally the local fire department. In some instances there may be no inspecting agency).

Owner/Operator Signature: _____ Date: _____

Return completed for to:
 UST Coordinator, Water Quality Bureau
 Idaho Department of Health and Welfare
 Division of Environmental Quality
 450 West State St.
 Boise, Idaho 83720
 Phone (208) 334-5845

Notification for Underground Storage Tanks

FOR TANKS IN ID	RETURN COMPLETED FORM TO CFA 744	UST Co. Operator, Water Quality Bureau Idaho Dept. of Health & Welfare Division of Environment 450 W. State Street Boise, ID 83720	5845 (208) 334-1251	STATE USE ONLY I.D. Number 120043 Date Received MAR 23 1990
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GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means—

(a) in the case of an underground storage tank in use on November 3, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and

(b) in the case of any underground storage tank in use before November 3, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:

1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes;
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks;
4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed \$10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. This form must be completed for each location containing underground storage tanks. If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached 2

I. OWNERSHIP OF TANK(S)

Name (Corporation, Individual, Public Agency, or Other Entity)
U.S. Department of Energy, Idaho Ops. Office

Street Address
785 00E Place 3481

County
Bonneville

City <u>Idaho Falls</u>	State <u>Idaho</u>	ZIP Code <u>83401</u>
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Area Code Phone Number
(208) 526-0193

Type of Owner (Mark all that apply | Current | State or Local Gov't | Private or Corporate |
| Former | Federal Gov't (GSA facility I.D. no. 10890808968) | Ownership uncertain |

II. LOCATION OF TANK(S)

(If same as Section I, mark box here)

Facility Name or Company Site Identifier, as applicable
Idaho National Engineering Laboratory (INEL)

Location: CFA

Street Address or State Road, as applicable
Scoville, Idaho

County
Butte

City (nearest) <u>Arco</u>	State <u>Idaho</u>	ZIP Code <u>83213</u>
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Indicate number of tanks at this location 17

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands

III. CONTACT PERSON AT TANK LOCATION

Name (if same as Section I, mark box here <input type="checkbox"/>) <u>W. C. Lattin</u>	Job Title <u>Environmental Scientist</u>	Area Code <u>(208)</u>	Phone Number <u>526-1508</u>
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IV. TYPE OF NOTIFICATION

Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative <u>Robert E. Tiller, Acting Manager, DOE-ID</u>	Signature <u>[Signature]</u>	Date Signed <u>3-21-90</u>
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CONTINUE ON REVERSE SIDE

DATE 03/13/90

INEL UNDERGROUND STORAGE TANKS

INEL TANK NUMBER	STATE OF IDAHO NO.	CURRENT STATUS	AGE 1990	GALLON/ CAPACITY	CONST. MATERIAL	INTERNAL PROTEC.	EXTERNAL PROTEC.	PIPING MATERIAL	CONTENTS	LAST REMAIN USED GALLONS	INERT
CFA 606-E1	1	ABANDONED	48	10,000	STEEL	NONE	PAINTED	TAR COATED STEEL	PETROLEUM GASOLINE	1950	
CFA 606-E2	2	ABANDONED	48	10,000	STEEL	NONE	PAINTED	TAR COATED STEEL	PETROLEUM DIESEL	1950	
CFA 680	3	OUT-OF-SERVICE	39	55	UNKNOWN	UNKNOWN	UNKNOWN	GALV. STEEL	PETROLEUM GASOLINE	1983	
CFA 713-4	4	ACTIVE	39	10,000	STEEL	NONE	PAINTED	TAR COATED STEEL	PETROLEUM GASOLINE		
CFA 713-5	5	ACTIVE	39	8,000	STEEL	NONE	PAINTED	TAR COATED STEEL	PETROLEUM GASOLINE		
CFA 731	6	ACTIVE	81	12,000	STEEL	LINED	PAINTED	TAR COATED STEEL	PETROLEUM AVIATION FUEL		
CFA 735	7	ACTIVE	31	500	STEEL	NONE	TAR	GALV. STEEL	PETROLEUM DIESEL		
CFA 737	8	ACTIVE	27	2,000	STEEL	NONE	PAINTED	TAR COATED STEEL	PETROLEUM DIESEL		
CFA 741-6	9	REMOVED	30	10,000	STEEL	NONE	PAINTED	GALV. STEEL	PETROLEUM DIESEL	1989	
CFA 741-7	10	ACTIVE	30	10,000	STEEL	NONE	PAINTED	GALV. STEEL	PETROLEUM DIESEL		
CFA 743	11	REMOVED	39	2,000	STEEL	UNKNOWN	UNKNOWN	STEEL	PETROLEUM WASTE OIL	1989	
CFA 744	12	REMOVED	30	1,000	STEEL	NONE	NONE	STEEL	PETROLEUM WASTE OIL	1989	
CFA 746	13	OUT-OF-SERVICE	82	285	STEEL	NONE	PAINTED	TAR COATED STEEL	PETROLEUM DIESEL		
CFA 748-A	14	ACTIVE	40	500	STEEL	NONE	PAINTED	TAR COATED STEEL	PETROLEUM DIESEL		
CFA 748-B	15	ACTIVE	40	500	STEEL	NONE	PAINTED	TAR COATED STEEL	PETROLEUM DIESEL		
CFA 763	16	OUT-OF-SERVICE	UNK	15,000	STEEL	UNKNOWN	UNKNOWN	UNKNOWN	PETROLEUM WASTE OIL	1985	

~~120043~~

3481

120043

RECEIVED
 MAR 23 1990
 DHW - Div. of Environment

DATE 03/13/90

INEL UNDERGROUND STORAGE TANKS

INEL TANK NUMBER	STATE OF IDAHO NO.	CURRENT STATUS	AGE 1990	GALLON/ CAPACITY	CONST. MATERIAL	INTERNAL PROTEC.	EXTERNAL PROTEC.	PIPING MATERIAL	CONTENTS	LAST REMAIN USED GALLONS	INERT
CFA MTN BELL 01		17 OUT-OF-SERVICE	76 15	1,000	1 STEEL	3 NONE	6 TAR	1 STEEL	PETROLEUM 5 GASOLINE	250	

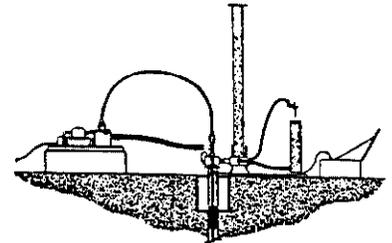
3481
120043

RECEIVED
MAR 23 1990
DHW - Div. of Environment



Precision Tank Testing

A Division of
CS Systems, Inc.
P.O. Box 10345
Cheyenne, WY 82003
(307) 637-3493



August 29, 1989

E G & G Idaho, Inc.
Mr. Keith Jones
Product Manager
P.O. Box 1625
Idaho Falls, ID 83415

Dear Mr. Jones:

The following product was upgraded, downgraded, transferred, or lost due to Petro-Tite underground line testing at: CFA-744 Idaho National Engineering Laboratory.

Product lost due to tank and line testing.

Unlead	N/A gallons
Diesel	Estimated 20 gallons

If there are any questions, please call us at 307-637-3493.

Respectfully,

A handwritten signature in cursive script that reads "Gene Fischer".

Gene Fischer
Manager

JOB # 5-16-6
 Page NA of NA

Data Chart for Tank System Tightness Test

PLEASE PRINT

1. OWNER: CFA, Name: IVEL, Address: NA, Telephone: NA

2. OPERATOR: NA, Name: FELICIA TAVES, Address: NA, Telephone: NA

3. REASON FOR TEST: I.E.P. in Full

4. WHO REQUESTED TEST AND WHEN: ES & S CONTRACT C89-102497, DATE: JUNE 89

5. TANK INVOLVED: CFA 744, Capacity: 1000, Location: BAYLOR B65

6. INSTALLATION DATA: Cover: CONCRETE, Location: CFA, Notes: 31 NO DROPE, 31 NO DROPE

7. UNDERGROUND WATER: Depth to water table: 400 + FT

8. FILL-UP ARRANGEMENTS: Tanks to be used: KEITH TAVES, Date: 8-24-89, Arranged by: KEITH TAVES, Filled by: KEITH TAVES

9. CONTRACTOR, MECHANICS, etc. involved: TEST WITH WASTE DIESEL FUEL

10. OTHER INFORMATION OR REMARKS: TEST WITH WASTE DIESEL FUEL

11. TEST RESULTS: CFA-744, 1000 GALLON WASTE OIL TANK, 54.75% LEAKAGE RATE: ESTIMATED, DATE TESTED: AUGUST 26, 1989

12. SENSOR CERTIFICATION: 104489, 1923



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 CS Systems, Inc.
 P.O. Box 10045
 Cary, NC 27513
 (919) 637-3493

13. This is to certify that these tank systems were tested on the date(s) shown. Those indicated as "tight" meet the criteria established by the National Fire Protection Association, Paragraph 21.

COPY

104489
 1923

14. CFA, IVEL, AUGUST 25 26 1989

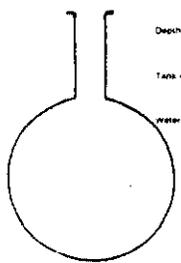
15. TANK TO TEST: CFA 744, NA 1 WASTE OIL

15a. BRIEF DIAGRAM OF TANK FIELD: CF665, WASTE OIL

16. CAPACITY: Nominal Capacity 1000, By most accurate capacity chart available 1034

17. FILL-UP FOR TEST: Size Water Bottom 1 1/4", Tank Diameter 40" X 11', TE = 3.42, READ = 4, Inventory 49", Total Gallons as Reading 995

18. SPECIAL CONDITIONS AND PROCEDURES TO TEST THIS TANK: X near in tank, NA high water table in tank excavation



NOTES: The above calculations are to be used for dry soil conditions to establish a positive pressure advantage or when using the four pound rule to compensate for the presence of subsurface water in the tank area.

19. TANK MEASUREMENTS FOR TSTT ASSEMBLY: Bottom of tank to grade 93, Add 30" for "T" probe assembly 30, Total tubing to assemble - approximate 11', 123

20. EXTENSION HOSE SETTING: Tank top to grade 50, Extend hose on suction tube 5 or more below tank top 56

22. Thermal-Sensor reading after circulation: Digits

23. Digits per "F" in range of expected change: Digits

COEFFICIENT OF EXPANSION (Complete after circulation): Corrected A.P.I. Gravity NA, Observed A.P.I. Gravity NA

21. VAPOR RECOVERY SYSTEM: ABOVE

24b. COEFFICIENT OF EXPANSION RECIPROCAL METHOD: TESTING WITH DIESEL FUEL

24c. FOR TESTING WITH WATER: Water Temperature after Circulation NA, Coefficient of Expansion NA

25. (a) NA, (b) NA, (c) NA

26. (a) SEE TEST 209, (b) 209, (c) NA

27		Sensor Calibration 16595 16595		30 HYDROSTATIC PRESSURE CONTROL		31 VOLUME MEASUREMENTS (IN RECORD TO 001 GAL)		34 TEMPERATURE		35 PENSAION (LBS)		38 NET VOLUME CHANGE EACH READING		39 ACCUMULATED CHANGE	
LOG OF TEST PROCEDURE				29 Reading No		32 Standpipe Level in inches		33 Product Applied (L)		35 Thermal Stress Reading		37 Computation		38 Temperature Adjustment	
28 DATE	CFA - 744	Record details of setting up and running test (Use full length of line if needed)		Beginning of Reading	Level to which Restored	Before Reading	After Reading	Product Recovered (L)	Thermal Stress Reading	Temp. Applied (L)	Computation	Temperature Adjustment	Net Volume Change	Accumulated Change	
		1000 GALLON WASTE OIL													
		TESTING THIS WASTE OIL TANK WITH DIESEL FUEL. DIESEL FUEL TO BE METERED INTO TANK TO DETERMINE EXACT CAPACITY.													
1630		9-25-89													
		24" MAN WAY IS NOT BOLTED DOWN & MAN WAY HOLE IS FULL OF DIESEL FUEL. 3" FILL PIPE 14" HD IN TANK. NO DROP TUBE, 4" FILL PIPE WITH 3" REMOTE TO GRADE. KNOWN REMOTE FALL INSIDE BUILDING - 3"													
0745		9-26-89 ARRIVED JOB SITE, PUMPED 40 GALLON OUT OF TANK TO FACILITATE MAINTENANCE PEOPLE.													
0900		DRILLED & TAPPED MAN WAY COVER & REMOTE 3" FILL IN BUILDING													
1100		FILLED TANK - MAN WAY LEAKS. PIPE FITTER INSTALLED PIT COVER ON MAN-WAY COVER.													
1200		ATTEMPTED TO TEST TANK. STAND PIPE WILL NOT HOLD ANY VOLUME. UN-ABLE TO STABILIZE TANK.													
1300		DUE TO ENVIRONMENTAL CONCERNS & E.P.A. Policy TESTING STOPPED.													
		ACTUAL PRODUCT LOSS EXCEEDED 20 GALLONS													
1900		AUDIT DATA.													

COPY

CONTINUATION: CFA 744 1000 GALLON WASTE OIL TANK A1

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Tank Test Data Chart
Additional Info

Estimated - 20,000
Net Volume Change at Conclusion of Precision Test

Signature of Tester: *[Signature]*
Date: *August 26, 1989*

Statement: *NA* Tank and product handling system has been tested tight according to the Precision Test Criteria as established by N.F.P.A. publication 329. This is not intended to indicate permission of a tank.

OR

Tank and product handling system has failed the tank tightness test according to the Precision Test Criteria as established by N.F.P.A. publication 329.

It is the responsibility of the owner and/or operator of this system to immediately advise state and local authorities of any implied hazard and the possibility of any reportable pollution to the environment as a result of the indicated failure of this system. Health Consultants Incorporated does not assume any responsibility or liability for any loss of product to the environment.

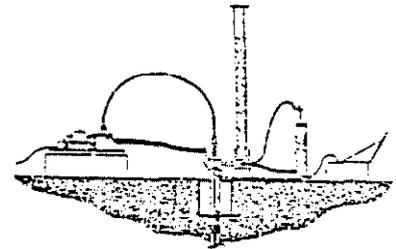
Tank Owner/Operator: *[Signature]*
Date: *8/26/89*



09085

Precision Tank Testing

A Division of
CS Systems, Inc.
P.O. Box 10345
Cheyenne, WY 82003
(307) 637-3493



SUMMARY TEST REPORT

All tank and line testing was performed using the Petro-Tite method for underground tank and line testing.

The following is a discussion of tanks tested, test results, and problems encountered. Tanks are listed by date tested and location.

Mr. Keith Jones, Project Manager, was briefed on test results, problems encountered and product lost due to tank and line testing.

All tanks tested have the following discrepancies:

1. Vent caps do not meet national code.
2. Vent lines are not extended above buildings in accordance with national code.
3. Fill pipe connecting points do not meet national code.
4. Metal gauge sticks to determine product level are in use. The E.P.A. has identified these metal gauging sticks as a cause for UST failures.
5. The tank fill pipes are not marked as to contents of tank.

DAY #1
Date: 8-14-89
Test Location: CPP

Tank #: SAA152

Test Result: +.035 GPH

Passed: *

Failed:

Problems Encountered: None

Tank #: SAA153

Test Result: +.016 GPH

Passed: *

Failed:

Problems Encountered: None

Day #2
Date: 8-15-89
Test Location: CPP

Tank #: HBF102

Test Result: +.014 GPH

Passed: *

Failed:

Problems Encountered:

1. This is a non-labled tank, which is not approved for underground burial. Project manager briefed on this item.
2. The bushing in tank top leaked when the tank was filled up into the fill pipe. Precision Tank Testing repaired this leak.
3. The height of vent line does not meet national code.

Tank #: CFG 6003

Test Result: -.417 GPH

Passed:

Failed: *

Problems encountered:

1. Discussed tank re-test with PM as tank is burried 78" from grade to tank top.

DAY #3
Date: 8-16-89
Test Location: PBF

Tank #: 741

Test Result: -12.000 GPH

Passed:

Failed: *

Problems Encountered:

1. The tank has a tin cover on it, with sheet metal screws and silicone sealant. This type of cover or fastening method does not meet EPA regulations. PM was at job site.

DAY #4
Date: 8-17-89
Test Location: TAN

Tank #: Tan792

Test Result: -.028 GPH

Passed: *

Failed:

Problems Encountered: None

Day #5.
Date: 8-18-89
Test Location: Tan

Tank #: Tan 783

Test Result: -.034 GPH

Passed: *

Failed:

Problems Encountered:

1. This tank took too long to stabilize tank end deflection, or it may be baffled on the inside.

DAY #6
Date: 8-19-89
Test Location: CFA

Tank #: 713-4

Test Result: +.018 GPH

Passed: *

Failed:

Problems Encountered: None

Tank #: 713-5

Test Result: Re-test #1
+.001 GPH

Passed: *

Failed:

Problems Encountered:

1. During initial testing it was discovered that the tank has a 24" man way in top.
2. The vent line was down sloped from the tank. This caused a trap in the vent line.

Day #7
Date: 8-20-89
Test Location: CFA

Tank #: 741-7

Test Result: +.035 GPH

Passed: *

Failed:

Problems Encountered: None

Tank #: 741-6

Test Result: -87.000 GPH

Passed:

Failed: *

Problems Encountered:

1. This tank has a hole in it with a rubber plug. It leaks. This repair does not comply with national code.
2. The product line is leaking visibly, out side island under dispenser. The gate valve is leaking on both sides at 1 1/2" x 2" bushings.

Day #8
Date: 8-21-89
Test Location: IRC

Tank #: 01SSW104

Test Result: +.019GPH

Passed: *

Failed:

Problems Encountered:

1. No leak detector installed on product line. Remote pressurized system.

Day #9
Date: 8-22-89
Test Location: NRF

Tank #: 01SSW511

Test Result: +.012GPH

Passed: *

Failed:

Problems Encountered: None

Tank #: 01SSW503

Test Result: visible leak

Passed:

Failed: *

Problems Encountered:

1. When the tank was filled for testing, the STP riser pipe had a leak in threads where it screws into tank top.

Day #10.
Date: 8-23-89
Test Location: CPP

Tank #: CFG 6003

Re-Test #1 Result: -.986 GPH

Passed:

Failed: *

Problems Encountered:

1. Tank top is not totally exposed and piping to pump house is still connected to tank.
2. Pipe fitters are reluctant to disconnect all piping from tank top.

Day #11
Date: 8-24-89
Test Location: NRF

Tank #: 01SSW503

Re-Test #1 Result: -.0495 GPH

Passed: *

Failed:

Problems Encountered:

1. The low level test data indicates this tank has a small leak. See data chart for Re-Test #1. PM briefed on this tank.

Day #12
Date: 8-25-89
Test Location: CPP

Re-Test #2 Result: -.456 GPH

Passed:

Failed: *

Problems Encountered:

1. Delays in getting piping disconnected from tank to pump house.
2. PM briefed on this tank.

Day #13
Date: 8-26-89
Test Location: CFA

Tank #: 743

Test Result: -34.000 GPH

Passed:

Failed: *

Problems Encountered:

1. Tank was waste oil. Testing medium was waste diesel fuel.
2. Tank was pumped out after tank testing.

Tank #: 744 OK

Test Result: -20.000 GPH

Passed:

Failed: *

Problems Encountered:

1. Tank was waste oil. Testing medium was waste diesel fuel.
2. Tank was pumped out after tank testing



ENVIRONMENTAL SOIL REPORT

Form EPRS-A

Page 1 of 3

Part 1 of 2

Date 4/10/91
 Agency Identification Number S89-0666-AB
 Account No. 03018

EG&G Idaho - INEL
 P.O. Box 1625
 Idaho Falls, ID 83415-2109
 Attention: Charles W. Ariss

Telephone (208) 526-9055

Sampling Collection and Shipment

Sampling Site _____ Date of Collection September 29, 1989

Date Samples Received at DataChem October 03, 1989

Analytical Results

ANALYSIS NAME	UNIT	CPA-743-1 EI 2981	CPA-743-2 EI 2982	CPA-743-3 EI 2983	CPA-744-1 EI 2984	CPA-744-2 EI 2985	CPA-744-3 EI 2986	MS EI 2987
Benzene								
10/05/1989	µg/g	ND*	ND*	ND*	ND*	ND*	ND*	.90
8020								
Methyl Benzene								
10/05/1989	µg/g	ND*	ND*	ND*	ND*	ND*	.10 1001/1	.90
8020								
Toluene								
10/05/1989	µg/g	ND*	ND*	ND*	ND*	ND*	ND*	.90
8020								
Xylene								
10/05/1989	µg/g	ND*	ND*	ND*	ND*	ND*	ND*	2.0
8020								

! See comment on last page.
 ND Parameter not detected.
 NR Parameter not requested.
 * Analyses completed on or before this date.
 ** Parameter not analyzed (See comment page).
 () Parameter between LOD and LOQ.
 [] Method Reference (See comments page.)

Analyst: James R. Baxter
 Report regenerated from archives.
 Reviewer: _____
Samuel Peltz
 Laboratory supervisor:



ENVIRONMENTAL SOIL REPORT

Form EPRS-A

Page 2 of 3

Part 2 of 2

Date 4/10/91
 Agency Identification Number SB9-0666-AB
 Account No. 03018

EG&G Idaho - INEL
 P.O. Box 1625
 Idaho Falls, ID 83415-2109
 Attention: Charles W. Ariss

Telephone (208) 526-9055

Sampling Collection and Shipment

Sampling Site _____ Date of Collection September 29, 1989

Date Samples Received at DataChem October 03, 1989

Analytical Results

Parameter Name	Analyte Data	Method	MSD	RI	2983						
Benzene	10/05/1989	b/dn	.90								
8020											
Ethyl Benzene	10/05/1989	b/dn	.90								
8020											
Toluene	10/05/1989	b/dn	.90								
8020											
Xylene	10/05/1989	b/dn	2.0								
8020											

↑ See comment on last page.
 ND Parameter not detected.
 NR Parameter not requested.
 † Analyses completed on or before this date.
 ** Parameter not analyzed (See comment page).
 () Parameter between LOD and LOQ.
 [] Method Reference (See comments page.)



ENVIRONMENTAL SOIL REPORT

Form EPRS-C
Page 3 of 3

Date _____
Agency Identification Number S89-0666-AB

General Set Comments

Samples EI2987 and EI2988 are matrix spikes of sample EI2981 to which 1.ug/g of benzene, ethylbenzene, and toluene and 2.ug/g of xylene have been added.

TANK SAMPLING & DISPOSAL CHECKLIST ¹

TANK NUMBER CFA 744

Tank Content Sampling

Content Sampling Required: YES NO DATE _____

Doc. #	Received
1) Hazardous Waste Manifest (Hazardous Waste Only)	_____
2) Waste Profile Sheet-669 Report (Hazardous Waste Only)	_____
3) Gamma Analysis (Hazardous Waste Only)	_____
4) Product Removal/Disposal Documentation	_____
5) Product Disposal Recommendations/Suggestions	_____
6) Sample Analysis Validation	_____ X _____
7) Chain of Custody Documentation	_____
8) Sample Analysis Results	_____
9) Sample Logbook (copy)	_____

Tank Removal Sampling

Removal Sampling Complete: YES NO DATE _____

Doc. #	Received
10) Hazardous Waste Manifest (Hazardous Waste Only)	_____
11) Waste Profile Sheet-669 Report (Hazardous Waste Only)	_____
12) Gamma Analysis (Hazardous Waste Only)	_____
13) Analysis of Results / Recommendation	_____
14) Sample Analysis Validation	_____
15) Chain of Custody Documentation	_____
16) Sample Analysis Results	_____
17) Sample Logbook (copy)	_____

Sludge Sampling

Sludge Sampling Complete: YES NO DATE _____

Doc. #	Received
1) Hazardous Waste Manifest (Hazardous Waste Only)	_____
2) Waste Profile Sheet-669 Report (Hazardous Waste Only)	_____
3) Gamma Analysis (Hazardous Waste Only)	_____
4) Product Removal/Disposal Documentation	_____
5) Product Disposal Recommendations/Suggestions	_____
6) Sample Analysis Validation	_____
7) Chain of Custody Documentation	_____
8) Sample Analysis Results	_____
9) Sample Logbook (copy)	_____

VIEW THE NOTE

E01

From: LAS --INELVM1 Date and time 06/13/90 09:03:21
To: JOC --INELVM1 J E COODY

From: LAS
Subject: ANALYSIS OF SLUDGE SAMPLES.

JOHN,

PER OUR TELEPHONE CONVERSATION ABOUT THE SOURCE OF THE SLUDGE THAT WAS SAMPLED, BY PERSONAL KNOWLEDGE, THOSE SAMPLES WERE TAKEN FROM SLUDGE REMOVED FROM TANK CFA 743 (1000 GAL. WASTE OIL TANK) AND TANK CFA 744 (1000 GAL. WASTE OIL TANK). TANK CFA 743 WAS REMOVED FROM BESIDE BUILDING CF 664. TANK CFA 744 WAS REMOVED FROM IN FRONT OF BUILDING CF 665.

THESE TANKS RECEIVED THE WASTE OIL THAT WAS DRAINED FROM THE CRANKCASES OF BUSES AND OTHER EQUIPMENT DURING OIL CHANGES.

IF I CAN BE OF ANY FURTHER ASSISTANCE, FEEL FREE TO GIVE ME A CALL OR YOU CAN CONTACT ME VIA PROFS.

PF1 Alternate PFs PF2 File NOTE PF3 Keep PF4 Erase PF5 Forward Note
PF6 Reply PF7 Resend PF8 Print PF9 Help PF10 Next PF11 Previous PF12 Return
4BÜ Aa B1--SESSION1 R 23 C 30 o-oP1 9:59 6/13/90

09109 CFA 744



ANALYTICAL REPORT

Form ARF-AL
Page 1 of 2
Part 1 of 1

Date 10/11/89
Agency Identification Number S89-0666-BB
Account No. 03018

EG&G Idaho - INEL
P.O. Box 1625
Idaho Falls, ID 83415-2109
Attention: Charles W. Ariss

Telephone (208) 526-9055

Sampling Collection and Shipment

Sampling Site _____ Date of Collection September 29, 1989
Date Samples Received at DataChem October 03, 1989

Analysis

Method of Analysis 8015
Date(s) of Analysis October 05, 1989

Analytical Results

Field Sample Number	DataChem Lab Number	Sample Type	Total Petroleum Hydrocarbons µg/g						
CFA-743-1	EI 2981	SOIL	ND*						
CFA-743-2	EI 2982	SOIL	4.						
CFA-743-3	EI 2983	SOIL	9.						
CFA-744-1	EI 2984	SOIL	3.						
CFA-744-2	EI 2985	SOIL	7.						
CFA-744-3	EI 2986	SOIL	76.						
MS	EI 2987	SOIL	6.						
MSD	EI 2988	SOIL	6.						
* Limit of Detection			2.						

* See comment on last page.
ND Parameter not detected.
NR Parameter not requested.
** Parameter not analyzed (See comment on last page).
() Parameter between LOD and LOQ.

Analyst: Kathleen Kraul
Reviewer: J. Baxter
Laboratory Supervisor: J. Baxter



ANALYTICAL REPORT

Form ARF-C

Page 2 of 2

Date 10/11/89
Agency Identification Number S89-0666-BB

General Set Comments

Samples EI2987 and EI2988 are matrix spikes of sample EI2981 to which 6.ug/g of dodecane has been added.

09111

VIEW THE NOTE

E01

From: LAS --INELVM1
JOC --INELVM1 J E COODY

Date and time 06/13/90 09:03:21

From: LAS
Subject: ANALYSIS OF SLUDGE SAMPLES.

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PF1 Alternate Pfs PF2 File NOTE PF3 Keep PF4 Erase PF5 Forward Note
PF6 Reply PF7 Resend PF8 Print PF9 Help PF10 Next PF11 Previous PF12 Return

4BÜ Aa B1--SESSION1 R 23 C 30 o-oP1 9:59 6/13/90

REMOVAL AND DISPOSITION CHECKLIST¹

TANK NUMBER CFA 744

Doc. #

Received

1) SWR Traveler Documentation

Tank Cut Down Complete: YES _____ NO _____ DATE _____

2) Tank Disposition Form

Excessed Current 04/05/90

3) Certificate of Destruction

4) Tank Removal Photographs

_____ X _____

5) Tank Disposal Photographs

6) Tank Replaced

YES _____ NO _____

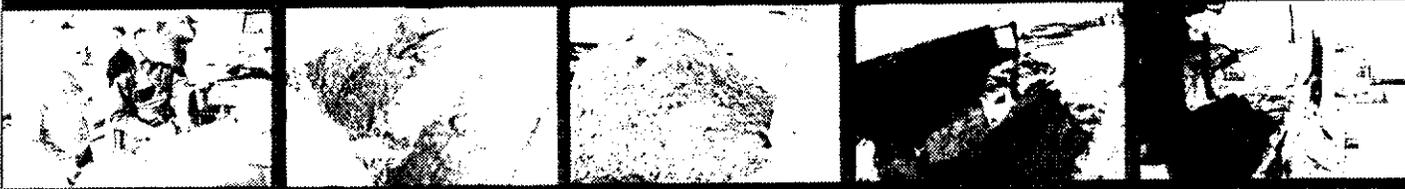
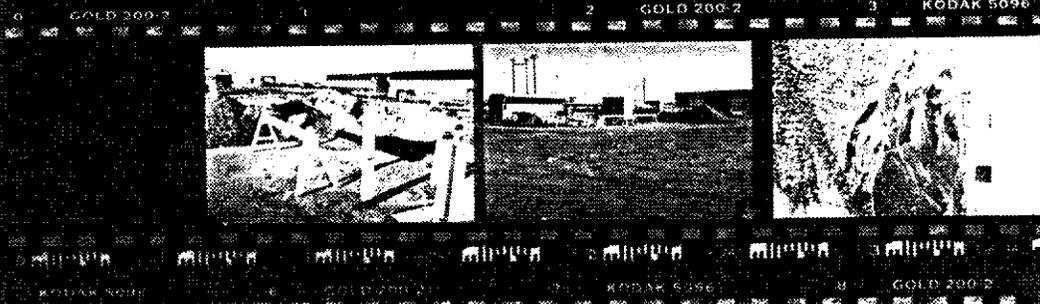
Replacement Tank Number _____

¹ Revised 2/1/91

89-564-1

Waste Oil Tank Removal

CFA 244
743
miked.
Per Pam P... ..



This is contact sheet.
It has not been corrected for color, density and/or contrast.

KODAK SAFETY FILM
ARCHIVAL PRESERVATION
DATE 9-29-87 ASSIGNMENT: Waste Oil Tank Removal

INSERT 4 ON SIDE DOWN

STYLE NO 35-78

CF-665

89-564-3

FILE NO

2 GOLD 200-2

3 KODAK 5096

4 GOLD 200-2

5 KODAK 5096

6 GOLD 200

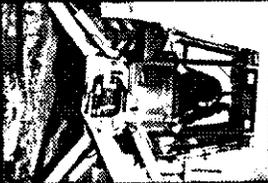


9-29-87

Waste Oil Tank Removal

89-564-2

2 GOLD 200 3 KODAK SBM 4 GOLD 200-2 5 KODAK



INVENTORY RECONCILIATION CHECKLIST¹

TANK NUMBER CFA 744

Doc. #	Received
1) Inventory Control Records	_____
2) Vapor Monitoring Reports	_____

¹ Revised 2/1/91